

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

| | | |
|----------------------------------|---|---------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | SACV 18-798-CJC-JDE |
| |) | |
| \$2,796,029.91 IN BANK FUNDS AND |) | |
| \$278,028.88 IN U.S CURRENCY, |) | |
| |) | |
| Defendant. |) | |

DECLARATION OF PUBLICATION

Notice of Civil Forfeiture was posted on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, beginning on May 14, 2018, as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, as evidenced by Attachment 1, which consists of a copy of the notice on the www.forfeiture.gov website, and as evidenced by Attachment 2, the Advertisement Certification Report, which documents that the notice was posted on the www.forfeiture.gov website for at least 18 hours a day for the required 30 consecutive days.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 13, 2018, at Los Angeles, CA.



Ricardo Reyes

Records Examiner

Attachment 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION
COURT CASE NUMBER: SACV 18-798; NOTICE OF FORFEITURE ACTION**

Pursuant to 18 U.S.C. § 981 and 18 U.S.C. § 984, the United States filed a verified Complaint for Forfeiture against the following property:

\$278,028.88 U.S. Currency (18-FBI-000056) which was seized on October 05, 2017 from Pacific College located at 3160 Red Hill Avenue, Costa Mesa, CA 92626

\$742,717.14 in funds from Bank Account Number XXXXXXXXX9035 in the name of Pacific College at Bank of America, Santa Ana, CA (18-FBI-000057) which was seized from Pacific College on October 10, 2017 at Bank of America, 1418 North Main Street, located in Santa Ana, CA

\$100,828.75 in funds from Bank Account Number XXXXXXXXX3623 in the name of William Nelson, Ila Nelson, William Woo, and Donna Woo at Bank of America, Santa Ana, CA (18-FBI-000058) which was seized on October 10, 2017 at Bank of America, 1418 North Main Street, located in Santa Ana, CA

\$540,709.81 in funds from Bank Account Number XXXXXXXXX7160 in the name of William O. Woo, Jr. and Donna Leung Woo at Bank of America, Santa Ana, CA (18-FBI-000059) which was seized on October 10, 2017 at Bank of America, 1418 North Main Street, located in Santa Ana, CA

\$370,894.69 in funds from Bank Account Number XXXXXXXXX2093 in the name of William L. Nelson and Ila M. Nelson, aka Ila M. Beaver at Bank of America, Santa Ana, CA (18-FBI-000060) which was seized on October 10, 2017 at Bank of America, 1418 North Main Street, located in Santa Ana, CA

\$11,770.61 in funds from Bank Account Number XXXXXXXXX3362 in the name of Marcus B. Tromp at Bank of America, Santa Ana, CA (18-FBI-000092) which was seized on October 10, 2017 at Bank of America, 1418 North Main Street, located in Santa Ana, CA

\$5,992.51 in funds from Bank Account Number XXXXX9750 in the name of Jennifer K. Woo at Travis Credit Union, Davis, CA (18-FBI-000093) which was seized on October 19, 2017 at Travis Credit Union, 1380 E. Covell Blvd., located in Davis, CA

\$1,023,116.40 in funds from Bank Account Number XXX9506 in the name of William L. Nelson and Ila Nelson at Schools First Federal Credit Union, Santa Ana, CA (18-FBI-000094) which was seized from William L. Nelson on October 10, 2017 at Schools First Federal Credit Union, 2115 North Broadway, located in Santa Ana, CA

The custodian of the property is the United States Marshals Service, located at 350 W. 1st Street, Suite 3001, Los Angeles, CA 90012

Any person claiming a legal interest in the Defendant Property must file a verified Claim with the court within 60 days from the first day of publication (May 14, 2018) of this Notice on this official government internet web site and an Answer to the complaint

or motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days thereafter. 18 U.S.C. § 983(h)(1) permits a court to impose a civil fine on anyone asserting an interest in property which the court determines was frivolous.

The verified Claim and Answer must be filed with the Clerk of the Court, 411 West Fourth Street, Room 1053, Santa Ana, CA 92701-4516, and copies of each served upon Assistant United States Attorney Steven R. Welk, 312 N. Spring St., 14th Floor, Los Angeles, CA 90012, or default and forfeiture will be ordered. See, 18 U.S.C. § 983(a)(4)(A) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. See 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Sections 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 PM EST 30 days after the date of final publication of this notice. See 28 C.F.R. Section 9.3(a). The

<https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant United States Attorney Steven R. Welk, 312 N. Spring St., 14th Floor, Los Angeles, CA 90012. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Attachment 2



Advertisement Certification Report

The Notice of Publication was available on the www.forfeiture.gov web site for at least 18 hours per day between May 14, 2018 and June 12, 2018. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. \$2,796,029.91 IN BANK FUNDS AND \$278,028.88 IN U.S. CURRENCY,

Court Case No: SACV 18-798
For Asset ID(s): See Attached Advertisement Copy

| Consecutive Calendar Day Count | Date Advertisement Appeared on the Web Site | Total Hours Web Site was Available during Calendar Day | Verification that Advertisement existed on Web Site |
|--------------------------------|---|--|---|
| 1 | 05/14/2018 | 24.0 | Verified |
| 2 | 05/15/2018 | 24.0 | Verified |
| 3 | 05/16/2018 | 24.0 | Verified |
| 4 | 05/17/2018 | 24.0 | Verified |
| 5 | 05/18/2018 | 24.0 | Verified |
| 6 | 05/19/2018 | 24.0 | Verified |
| 7 | 05/20/2018 | 24.0 | Verified |
| 8 | 05/21/2018 | 24.0 | Verified |
| 9 | 05/22/2018 | 23.9 | Verified |
| 10 | 05/23/2018 | 24.0 | Verified |
| 11 | 05/24/2018 | 24.0 | Verified |
| 12 | 05/25/2018 | 24.0 | Verified |
| 13 | 05/26/2018 | 24.0 | Verified |
| 14 | 05/27/2018 | 24.0 | Verified |
| 15 | 05/28/2018 | 24.0 | Verified |
| 16 | 05/29/2018 | 24.0 | Verified |
| 17 | 05/30/2018 | 23.9 | Verified |
| 18 | 05/31/2018 | 24.0 | Verified |
| 19 | 06/01/2018 | 24.0 | Verified |
| 20 | 06/02/2018 | 24.0 | Verified |
| 21 | 06/03/2018 | 24.0 | Verified |
| 22 | 06/04/2018 | 24.0 | Verified |
| 23 | 06/05/2018 | 24.0 | Verified |
| 24 | 06/06/2018 | 24.0 | Verified |
| 25 | 06/07/2018 | 24.0 | Verified |
| 26 | 06/08/2018 | 24.0 | Verified |
| 27 | 06/09/2018 | 24.0 | Verified |
| 28 | 06/10/2018 | 24.0 | Verified |
| 29 | 06/11/2018 | 24.0 | Verified |
| 30 | 06/12/2018 | 24.0 | Verified |

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.